

Before the
Federal Communications Commission
Washington, DC 20554

| | | |
|--|---|--------------------|
| In the Matter of |) | |
| |) | |
| Petition for Waiver of |) | |
| FCC Form 471 Filing Deadline |) | |
| |) | |
| Pribilof School District BEN #17000376 |) | CC Docket No. 02-6 |
| Pribilof School District <Consortium>, BEN #17011643 |) | |
| |) | |
| Schools and Libraries Universal Service Support Mechanism |) | |

**Petition for Waiver of
FCC Form 471 Filing Deadline for Funding Year 2016
RE: FCC Form 471 Application # 161061517**

I. INTRODUCTION AND SUMMARY

The Pribilof School District Consortium ("PSDC") serves 91 low income kindergarten through Grade 12 students in rural remote Alaska. Located in the Bering Sea, Pribilof School District Consortium (St. George and St. Paul Islands) are approximately 270 miles from the "mainland" of the Aleutian Chain in Southwest Alaska. The Consortium consists of two K-12 schools and two public libraries that are recognized by the Alaska State Library System. These two libraries are located within the schools and are utilized by the general public after school hours.

The Pribilof School District Consortium submitted and certified their Funding Year 2016 FCC Form 471, #161061517, in the E-Rate Productivity Center (EPC) portal of the Schools and Libraries Division ("SLD") of the Universal Service Administrative Company's ("USAC") website, on July 25, 2016, just 4 days¹ after the FCC Form 471 consortium filing deadline of July 21, 2016.

Extenuating Circumstances:

1. Administration change that included a new Superintendent, business management consultant, and no technology director within the district.
2. No experienced E-Rate individual on staff
3. School district profile within EPC not updated with relationships to St. George, St. Paul Schools, nor the Community Libraries to create the consortium as per Alaska State Coordinator guidance
4. *ONLY* the USAC Customer Service Bureau (CSB) had the ability to relate schools/libraries and create a consortium within EPC
5. The previous (FY15-16) Superintendent was the Account Administrator, and the now current (FY16-17) Superintendent that came to the district after the filing period, had no access to EPC.
6. No "out of window" letters are being sent by USAC, current Superintendent learned of application status from a Service Provider, August, 2016

Summary

During the commencement of updating the new USAC E-Rate Productivity Center (EPC), the previous administration of Pribilof School District was instructed by the Alaska State Coordinator to comply with updating within EPC, that they would need to work with the USAC Customer Service Bureau (CSB) to create a consortium between the school district's schools and the community libraries which are located in each of those two schools.

Those instructions were not complied with prior to the departure of the previous administration (Superintendent and Business Manager) and were not relayed to the now current administration who was unaware that the creation of the consortium within the EPC had not been accomplished. Additionally, the previous Superintendent was the EPC Account Administrator and left the District without taking the appropriate steps to allow access to the EPC account by the incoming Superintendent.²

The business manager was not an E-Rate Program expert nor had any training or experience with the new EPC system. There was also a great deal of confusion regarding the multiple deadline extensions given by USAC. (<original>April 29, <extension>May 26 and <consortium> July 21, 2016).

Upon requesting (via phone – Case #97780) assistance from CSB, on July 5, 2016, CSB related the two district entities within EPC but not the community libraries that would have been part of the construct of the consortium. Also, at that time, CSB informed the district that they showed an "incomplete" FCC Form 471 and, since the system would not update that current form with the newly related entities, that incomplete form should be deleted and a new Form 471 created.

Again, without guidance that only CSB could create a consortium in the EPC, the business manager continued using the public school district account and attempted to create the new FY16 471 well before the filing deadline of July 21, 2016. Due to internet access difficulties they were unable to maintain a connection and remain online without internet access timing out.

Ultimately, FY16 471 #161061517 was filed and certified on July 25, 2016 (four days after the July 21, 2016 deadline) with the status of "certified, out-of-window."

II. Request

The Pribilof School District Consortium respectfully petitions the Commission to request a waiver of the Funding Year 2016 FCC Form 471 filing deadline on behalf of the Pribilof School District Consortium to allow the Out of Window submission of their E-Rate Funding Year 2016 FCC Form 471 #161061517, due to the circumstances related above. Not granting this waiver request to move the application into an "In Window" status, would create a dire financial hardship on this rural remote Alaskan School District and Community Libraries Consortium.

The Pribilof School District Consortium also respectfully requests the Commission to direct USAC to properly designate the FY16 Application #161061517 within the EPC system as a Consortium.

Respectfully submitted,



Brett Agenbroad, Superintendent
Pribilof School District Consortium
930 Tolstoi
P.O. Box 207
St. Paul Island, Alaska 99660
907-546-3337
agenbroadb@pribiliof.org



Kela Halfmann, E-Rate Coordinator
SERRC – Alaska's Educational Resource Center
805 W. 3rd Avenue
Anchorage, Alaska
907-349-0651
kelah@serrc.org

Dated: November 18, 2016

¹*Requests for Waiver of Decisions of the Universal Service Administrator by Academy for Academic Excellence et al.; Schools and Libraries Universal Service Support Mechanism*, CC Docket No. 02-6, Order, 22 FCC Rcd 4747, 4748-49, para. 4 (WCB 2007) (granting waivers where the applicants filed after the close of the filing window due

to delays beyond its control), and Bishop Perry Middle School (New Orleans, LA, et. al.) and Schools and Libraries Universal Service Support Mechanism CC Docket No. 02-6, Order, FCC 06-54 (Released May 19, 2006, Revised May 31, 2006)

² See *Bishop Perry Order*, 21 FCC Rcd at 5323, para. 14.